

Privacy Policy and Federal Privacy Notice - Nigeria

LAST UPDATED: 1 May 2021

PRIVACY POLICY

This privacy policy ('the Privacy Policy') applies to The Breukr (Company number: 2872273) and their affiliates and related companies, (together, 'Breukr', 'we', 'us' or 'our'), and details how we collect, manage and use Personal Information, including but not limited to Personal Information collected on our websites, mobile applications, via email, cloud-based services, or controlled widgets embedded in communication platforms with a link to this Privacy Policy ("Websites"). By "Personal Information" we mean information that is associated with a specific person and can be used to reasonably identify that person. Personal information does not include information that has been made anonymous and cannot reasonably identify a specific person. It covers how we collect, use, and share that Personal Information as of the date that this Privacy Policy is posted.

If we have collected personal data from you as a beneficial owner, director, other employee or trustee of a Merchant, please refer to our Merchant Privacy Policy.

Breukr is committed to respecting the privacy of your Personal Information. We appreciate that individuals are concerned about the security of their Personal Information and we are committed to protecting any Personal Information in our custody or control.

Breukr's retailers (which may include online market places) and commercial partners (together, 'our Partners') are independent of Breukr and may have privacy policies which differ from ours. Our Partners are responsible for their own privacy policies and privacy practices. Please contact our Partners directly for further information on their privacy policies.

The Websites may also contain links to third party websites. These linked sites are not under our control and we are not responsible for content on these sites, nor are these sites subject to this Privacy Policy. Before disclosing your personal information on any third-party website we recommend that you examine the terms and conditions and privacy policy of that site.

This Privacy Policy applies when you sign up for, access, or use our services, features, technologies or functions offered on our Websites (collectively 'Breukr Services') and in relation to Personal Information we may otherwise collect during the course of our business as set out in this Privacy Policy.

Breukr may amend the Privacy Policy at any time. The updated version will be available by following the 'Privacy' link on the Websites. The revised version will be effective from the time we post it on the Websites. Breukr may highlight any material changes to the Privacy Policy that may impact you by notifying you by email or otherwise.

Collecting Personal Information

Breukr strives to be fair and open about the way we collect information about you and what we intend to do with the information.

We receive and store certain types of information from you when you interact with our Websites to deliver the products you request from us, and help improve your overall online experience. For example, like many other websites, we store “cookies” and other web-based files on user devices to get certain types of information when your web browser, mobile phone, or other device accesses our Website. The information sent to us may include data on the pages you access, your computer IP address, device identifiers, the type of operating system you are using, your location, mobile network information, standard web log data and other information. Web log data includes the browser type you are using and traffic to and from our site. When you visit our Websites or use Breukr Services, we may also collect information about your transactions and your activities. Details on our collection of Personal Information through the use of cookies and analytical services is set out below.

In addition, if you open an Breukr account with us or use Breukr Services, we may collect the following types of information:

- Contact information, such as your name, address, phone number, email and other similar information.
- Financial information, such as the full bank account numbers and/or credit or debit card numbers that you link to your Breukr account or give us when you use Breukr Services.
- Detailed Personal Information such as your date of birth, driver’s license number, or other identification information or documents.

We may also obtain information about you from third parties including our Partners and related companies, as well as credit reporting bodies and identity verification services, and publicly or commercially available sources for the purposes of complying with relevant legislation (e.g., anti-money laundering laws).

You may choose to provide us with access to certain Personal Information stored by third parties such as social media sites (e.g., Facebook, Instagram and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your Breukr account and authorizing Breukr to have access to this information, you agree that Breukr may collect, store and use this information in accordance with this Privacy Policy.

We may also collect your Personal Information if you enter a competition or promotion we run (either directly or through our marketing agents or our Partners), or if you apply for employment with us either directly or through a recruitment or employment agency.

We may collect Personal Information about our Partners’ staff directly from those staff or from our Partners. The information we collect about our Partners’ staff may include your name, position, contact details and training records.

We may also collect the Personal Information of our suppliers and service providers’ staff during the course of our business activities. This information may include your name, contact details and position. We will collect this information directly from you, or from the applicable supplier or service provider.

In order to help protect you from fraud and misuse of your Personal Information, we may collect information about your use and interaction with our Websites or Breukr Services. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

We may also collect additional information from or about you in other ways, such as through contact with our customer support team, suppliers or service providers (whether via mail, email or through telephone enquiries), your responses to a market survey, and from interactions with Breukr's Partners or as otherwise notified to you at the time.

In Nigeria, The Breukr is the agency collecting Personal Information and that will hold the information, but may share the information collected with other parties as set out in this Privacy Policy. The Breukr's address is Plot 53 Haruk Road, Off Obi Wali Road, Port Harcourt 500242, Rivers State, Nigeria.

Using Personal Information

Breukr only collects, holds and handles information about you that is necessary for us to perform the services you request from us, that is otherwise reasonably necessary for our business activities or if required by law, court, or tribunal order.

We may use Personal Information we collect about you for a number of purposes including:

- provide (or assess whether to provide) Breukr Services;
- customer support;
- process transactions and send notices about your transactions;
- resolve disputes, collect fees, and troubleshoot problems;
- investigate and prevent potentially prohibited or illegal activities;
- enforce our User Agreement with you;
- learn more about your level of satisfaction, your expectations of us and our Partners, and how we can meet them (for example, in relation to Breukr Services, and the goods offered by Breukr's retailers);
- customize, measure, and improve Breukr Services and the content, layout, and operation of our Websites;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- contact you via telephone, text (SMS) or email messaging, including as authorized by our User Agreement;
- compare information for accuracy and verify it with third parties;
- confirm your identity for the purposes of anti-money laundering and counter-terrorism laws and assess applications and your suitability for Breukr Services;
- to consider you for a position at Breukr for which you have applied;
- to acquire goods or services from you or from your employer;
- for the purpose of performing data analytics including to improve our and our Partners' services;
- for other purposes to which you have consented; and
- as required or permitted by relevant laws and regulations.

You agree that we may use your Personal Information for the purposes for which we collect it and for related purposes which would be reasonably expected by you.

If all or some of your Personal Information is not collected or cannot be verified, we may be unable to provide you with Breukr Services or a customized experience, engage with you, or do business with you.

SMS Terms & Conditions

By entering your mobile number, you agree to receive text messages for service notifications and verification codes from Breukr. Message frequency will vary. Reply HELP for help, STOP to stop (or cancel). Standard Message & Data rates may apply. We do not sell your data. Carriers are not liable for delayed or undelivered messages.

How we share Personal Information with other parties

We may share your Personal Information with:

- Our affiliates and related companies;
- Our Partners and the suppliers and service providers who help with our business operations including in relation to fraud prevention, identity verification, payment collection, marketing, customer service, and technology services;
- Our retailers, so that they can provide goods or services to you or respond to a complaint by you, or to help them improve the quality and standard of service they provide to you;
- Financial institutions that we may partner with to jointly create and offer a product;
- Credit reporting bodies and collection agencies, including to report account information, as permitted by law. When we share your Personal Information with credit reporting bodies we authorize them to use that information for the purposes of providing their credit reporting services. To request a credit report, we will provide information to the credit reporting body that identifies you;
- Banking partners as may be required by credit card association rules for inclusion on their list of terminated merchants;
- Companies that we plan to merge with or be acquired by or who may invest in us;
- Law enforcement, government agencies or officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to Breukr; when we need to do so to comply with law or credit card rules; or when we believe, in our sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate suspected violations of our User Agreement;
- Your nominated referees so that we may check your references if you are applying for a position with Breukr; and
- Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing Personal Information may be less stringent than in your jurisdiction. When we disclose your Personal Information overseas, we will take all reasonable measures to ensure that your information is held, managed and accessed in accordance with appropriate standards for the handling of Personal Information.

In addition, you should note that retailers you buy goods or services from or contract with (even if such goods or services are purchased using Breukr Services) have their own privacy policies, and Breukr is not responsible for their actions, including their information protection practices.

We will only share your Personal Information with third parties as described in this Privacy Policy or as otherwise notified to you at the time of collection or with your consent.

If you open an Breukr account directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly on Breukr's Websites) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with Personal Information. Breukr is not responsible for the content or information practices of such third parties.

Consent

We may require your consent to use and/or disclose your Personal Information if we need to use your information for a purpose that is not related to the purpose for which it was collected.

If you do not consent to Breukr collecting, using and/or disclosing your Personal Information for such other purposes, this may affect Breukr's ability to deliver and improve our products and services, or to engage or do business with you.

When you provide us with your name, date of birth and residential address in establishing your profile with us, you consent to us disclosing that information to credit reporting bodies and requesting an assessment of whether it matches personal information held by the body to assist in verifying your identity under anti-money laundering laws. The body may provide us with that assessment and use your personal information, and the names, residential addresses and dates of birth of other individuals, to prepare that assessment.

If there is a failure to verify your identity in the way described above, we will notify you within the secure Breukr service or otherwise. If you do not want to proceed in verifying your identity, you should contact us, as provided below.

Marketing and privacy

Breukr may send marketing materials from time to time to those who have provided Breukr with Personal Information about products and services offered by Breukr and our Partners. We may use your Personal Information to make inferences and present more relevant content, such as your preferred retailers, purchase and spending habits.

If you signed up to receive newsletters or other marketing communications from us, you can opt-out any time by clicking the unsubscribe link at the bottom of the message. You can also log-in to your account to opt-out and update your marketing preferences at any time.

Even after you opt-out or update your marketing preferences, please allow us sufficient time to process your marketing preferences. Unless otherwise required to process your requests earlier by law, it may take up to 5 days to process your opt out requests in relation to receipt of electronic marketing materials such as emails and SMS, and up to 30 days for all other marketing-related requests.

Even after you've opt-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, outstanding payment inquiries, surveys or recalls, or any questions regarding a specific order.

You may also contact us on:

Email: hello@breukr.com

Phone (Nigeria): +234 818 857 8245

Mail: Plot 53 Haruk Road, Off Obi Wali Road, Port Harcourt 500242, Rivers State, Nigeria.

Controlling Our Tracking Tools & Do-Not-Track Disclosures

Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Websites. If you block or delete cookies, not all of the tracking that we have described in this policy will stop. If you continue without changing your settings, we will assume that you are happy to receive all cookies on this Site. You can change your cookie settings at any time. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

Cookies and third-party analytical services

We use cookies and track IP addresses via our Websites so we can improve our services provided by our Websites and enhance your user experience.

When you access our Websites or use Breukr Services, we (including our Partners and companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively 'Cookies'). We use Cookies to ascertain which web pages are visited and how often, to make our Websites more user friendly, to give you a better experience when you return to a website and to target advertising to you that we think you may be interested in.

For example, Cookies allow us to save your password so you do not have to re-enter it every time you visit our site.

Most web browsers automatically accept Cookies. You can find information specific to your browser under the "help" menu. You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our Websites and Breukr Services.

Controlling Online Interest-Based Ads

We sometimes work with online advertising vendors to provide you with relevant and useful ads. This may include ads served on or through our Websites. This may also include ads served

on other companies' websites. These ads may be based on information collected by us or third parties. For example, your postal code may be used to target an ad for people in your area. These ads may also be based on your activities on our Websites or on third party websites.

Our Websites also use Google Analytics, a web analysis service of Google Inc. ('Google'). Google Analytics uses Cookies to monitor traffic to, and use of, the Websites. Information about the use of the Websites generated by these Cookies is generally transferred to a Google server in the USA and stored there. Google uses this information on our behalf to evaluate your Website usage, to compile reports on the Websites activities, and to provide additional services connected with the Websites. We will not identify you to Google, and will not merge personal and non-personal information collected through this service. You can prevent the use of Google Analytics Cookies by adjusting the settings on your browser software, however, you may not be able to fully use all of the functions of the Websites if you do so.

In addition to Google Analytics, we may also use other third-party analytics tools including but not limited to Amplitude (an analytics service provided by Amplitude Inc.) to monitor, analyze and collect information about your use of the Websites.

For more information about our ad service provider and its cookies, including information about how to opt out of these technologies, you may visit <http://optout.aboutads.info> In addition, users may prevent Google's collection of data generated by your use of the Websites (including your IP address) by downloading and installing a Browser Plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

Protecting Personal Information

Breukr will keep your Personal Information secure by taking reasonable steps to protect it from misuse, loss, and unauthorized access, use, modification, and disclosure.

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration.

We also review our security procedures periodically to consider appropriate new technology and updated methods. Only properly authorized people who have a need to access Personal Information to perform their job will be able to see or use that information. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

Children's Personal Information

We do not knowingly request to collect Personal Information from any person under the age of 18. If Breukr suspects a user of being under 18 years of age, we will require the user to close his or her account, will not allow the user to continue using Breukr Services. Please notify us if you know of any individuals under the age of 18 using the Breukr Services so we can take action.

Accessing and requesting correction of Personal Information

We will strive to ensure that information about you is accurate when we collect or use it. Subject to some exceptions under privacy law, we will let you see the information we hold about you and

correct it if it is inaccurate, incomplete or out-of-date. If we do not grant you access to your Personal Information or do not agree to correct your Personal Information, we will tell you why.

If you wish to obtain access to and/or correct your Personal Information held by Breukr, please contact Breukr on:

Email: hello@breukr.com

Phone (Nigeria): +234 818 857 8245

Mail: Plot 53 Haruk Road, Off Obi Wali Road, Port Harcourt 500242, Rivers State, Nigeria.

For California Residents. California Civil Code (Section 1798.83) gives Breukr customers who are California residents the right to request certain information about our disclosure of Personal Information to third parties for their own direct marketing purposes. If you wish to make this request, please e-mail, call, or write to us at the address provided above.

Unless we do not agree to your request for access to Personal Information, in most cases Breukr will provide you with access as soon as reasonably possible following receipt of your request. If you request corrections to your Personal Information and Breukr agrees with your request, these changes will be made as soon as practicable. If Breukr does not agree to your request for correction, it will notify you of the reasons it does not agree and will note your request on the records it holds about you. If you are dissatisfied with our refusal to provide you with access to, or correct, your Personal Information you may also complain to the applicable regulator in your jurisdiction.

Subject to the terms set out in the Breukr User Agreement, you can also close your Breukr account through our Websites. If you close your Breukr account, we may retain information from your account for a period of time to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud or risk, enforce our User Agreement, or take other actions as required or permitted by law.

Resolving your concerns

If you have a complaint regarding Breukr's management of your Personal Information, please prepare your complaint in writing and email it to us at hello@breukr.com

Breukr will provide written acknowledgement of your complaint within 7 days of receipt. We will investigate and advise you of the steps we have taken to resolve your complaint within 30 days of receipt of your complaint.

FEDERAL PRIVACY NOTICE (Rev.8/2018)

Facts	What does Breukr do with your personal information?
--------------	------------------------------------------------------------

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> · Account balances and payment history · Credit history · Personal identifying information including name, address and identification numbers <p>When you are no longer our customer, we continue to share your information as described in this notice</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Breukr chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Breukr Share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliate's everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliate's everyday business purposes - information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions? privacy@breukr.com

Who we are

Who is providing this notice? The Breukr

What we do

How does Breukr protect my personal information?	We protect your personal information from unauthorized access and use with security measures that comply with federal law. These measures include computer safeguards and secured files and office.
How does Breukr collect my personal information?	We collect personal information, for example, when you: <ul style="list-style-type: none">• Open an account or provide information• Request to use the installment feature• Make payments or account changes We also collect information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none">• sharing for affiliates' everyday business purpose - information about your creditworthiness• affiliates from using your information to market to you• sharing for nonaffiliates to market to you
What happens when I limit sharing for an account I hold jointly with someone else?	Breukr does not offer joint accounts.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
------------	-----------------------------------------------------------------------------------------------------

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliated companies we share with include marketing companies, merchant partners, and other service providers.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
Breukr doesn't share for the purposes of joint marketing.

Other Important Information

Conflicts: To the extent there are any conflicts between this notice and Breukr's privacy policy, this notice will control for Nigerian customers.

Telephone Communications: Breukr and its authorized agents, service providers and partners may monitor and/or record all telephone communications in accordance with applicable law.

We will not share personal information that we collect about you with nonaffiliated third parties without your authorization except as permitted by law.

We will not disclose information about your creditworthiness to our affiliates and will not disclose your information to nonaffiliated third parties to market to you without your authorization, other than as permitted by Vermont law.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (as used within this Privacy Rights Notice, "personal information"). In particular, when you use any of the Breukr Services, including the Websites, mobile applications, and other services (the "Services"), Breukr may collect the following categories of personal information (including within the last twelve (12) months):

Category	Examples
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name,

	social security number, driver's license number, passport number, or other similar identifiers
B. Personal information categories.	A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F. Geolocation data.	Physical location or movements.
G. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.

Breukr obtains the categories of personal information listed above from the following categories of sources:

- Directly from you (for example, from forms you complete or products and services you purchase).
- Indirectly from you (for example, from observing your actions on websites).
- From third parties (for example, from identity verification services).

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment, facilitate delivery and resolve disputes. We may also save your information to facilitate new product orders or process returns.

- To provide, support, personalize, and develop our Websites, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Websites experiences.
- To deliver targeted marketing, service update notices, and promotional offers.
- For testing, research, analysis, and product development, including to develop and improve our Websites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Breukr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Breukr about our Website users is among the assets transferred.

Sharing Personal Information

Breukr may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

- Subsidiaries and affiliates.
- Contractors and service providers.
- Third parties with whom we partner to offer products and services to you.
- Other third parties as described above in "How we share Personal Information with other parties."

Disclosures of Personal Information for a Business Purpose

In the preceding 12 months, Breukr has disclosed the following categories of personal information for a business purpose to the parties identified above:

Category A: Identifiers.

Category B: Customer Records personal information categories.

Category C: Protected classification characteristics under federal law.

Category D: Commercial information.

Category E: Internet or other similar network activity.

Category F: Geolocation data.

Category G Inferences drawn from other personal information.

Sales of Personal Information

In the preceding 12 months, Breukr has not sold personal information as we understand that term to be defined by the CPA and its implementing regulations.

Your Rights and Choices

The CPA provides consumers with specific rights regarding their personal information. This section describes your CPA rights and explains how to exercise those rights.

Access Rights

Subject to exceptions (including those applicable to CPA Exempted Data), you have the right to request that Breukr disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access and Deletion Rights), and depending on the nature of your request, we may disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that Breukr delete any of your personal information that we collected from you and retained, subject to certain exceptions (including those applicable to CPA Exempted Data). Once we receive and confirm your verifiable consumer request (see Exercising Access and Deletion Rights), we will delete or anonymize (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with local Electronic Communications Privacy Acts.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

EXERCISING ACCESS AND DELETION RIGHTS

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by submitting a request through our Help Center.

Only you or an authorized agent may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CPA rights.

Controlling Our Tracking Tools & Do-Not-Track Disclosures

Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Websites. If you block or delete cookies, not all of the tracking that we have described in this policy will stop. If you continue without changing your settings, we will assume that you are happy to receive all cookies on this Site. You can change your cookie settings at any time. Some browsers have a “Do Not Track” feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.